

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA

2015 JUN -1 P 3:35

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FEDERAL BUREAU OF INVESTIGATION

SATYAJIT SANYAL, Pro Se)

Plaintiff)

)

Vs.)

Case # 1:14-cv-00960-JCC-TCB

)

Toyota Motor North America, Inc., et al)

Defendants)

ADDENDUM To PLAINTIFFS MEMORANDUM IN OPPOSITION TO
DEFENDANTS TOYOTA MOTOR SALES, U.S.A. INC, TOYOTA MOTOR
MANUFACTURING KENTUCKY, INC AND TOYOTA MOTOR
ENGINEERING & MANUFACTURING NORTH AMERICA, INC'S
MOTION For SUMMARY JUDGEMENT

Plaintiff, SATYAJIT SANYAL, by Pro Se, hereby submits this Addendum to his Memorandum in opposition to Defendants Motion for Summary Judgment, submitted in support of his demand for dismissal of the Defendants Motion:

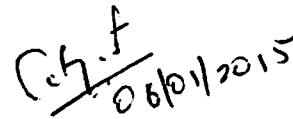
- The Plaintiff submits as Exhibit 14, the Doctor's hand-written note from his medical records for the subject accident, received from Reston Hospital, written by Dr. Tajammul Ehsan, M.D. which explicitly confirms Dr. Eshan's diagnosis that the Plaintiff suffered "Post traumatic epilepsy" during the subject accident.
- The hand-written note from Dr. Tajammul Ehsan, M.D clearly contradicts the defendants claim that the Plaintiff's Seizure caused the subject accident.

- The hand-written note from Dr. Tajammul Ehsan, M.D. clearly confirms the defendants misinterpretation of the original statement of Tajammul Ehsan, M.D. dated 07/12/2012 which stated "Thirty-nine-year-old with presumed diagnosis of posttraumatic epilepsy who comes in with breakthrough seizures resulting in motor vehicle accident with further episodes witnessed in the ER."

The Plaintiff humbly requests the Honorable Court to accept this addendum and admit in records the documents from Exhibit 14 to his original memorandum in opposition to Defendant's Motion for Summary Judgment and to allow continuance of the trial of this case by Jury.

RESPECTFULLY SUBMITTED, this 1st day of June 2015.

By:

 06/01/2015

SATYAJIT SANYAL, Pro Se

Satyajit Sanyal

Mailing Address:

11654 Plaza America Drive, #622,
Reston, Virginia - 20190

Copy of Addendum to Plaintiff's Memorandum in Opposition to Defendants, Toyota Motor Sales, U.S.A., Inc. Toyota Motor Manufacturing Kentucky, Inc. and Toyota Motor Engineering & Manufacturing North America, Inc.'s Motion for Summary Judgment will be mailed to Defendant's Attorney on record:

Joel A. Dewey

Paul J. Day

DLA Piper LLP (US)

The Marbury Building

6225 Smith Avenue

Baltimore, Maryland – 21209

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CERTIFICATION

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I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

SATYA JIY SANYAL
Name of *Pro Se* Party (Print or Type)

C. J. T. 06/01/2015
Signature of *Pro Se* Party

Executed on: 06/01/2015 (Date)

OR

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)
Prepared, or assisted in the preparation of, this document.

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)